

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ESSEX INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 16 cv 2580
)	
HOUSECALL PHYSICIANS OF ILLINOIS,)	
S.C. d/b/a MD@HOME, CHARLES DEHAAN,)	
THELMA YOUNG, RAQUEL BROWN,)	
JUDITH KOHL, DEBORAH CURTIS,)	
GERTRUDE GLASPIE, DEBRA)	
LINGELBACH, BRENDA NELSON and)	
SUSAN BEESELY,)	
)	
Defendants.)	

HOUSECALL'S MOTION FOR EXTENSION TO FILE REPLY

Defendant, Housecall Physicians of Illinois, S.C. d/b/a MD@Home ("Housecall"), by its attorneys, moves pursuant to FRCP 6 for an extension of time to file its Reply in Support of Motion to Compel, stating in support as follows:

1. By order dated February 16, 2017 (Dkt #60), Housecall was granted 7 days, through and until March 9, 2017, to reply to Plaintiff's Response (Dkt #61) on Housecall's Motion to Compel Discovery Production, for the status hearing on March 14, 2017.

2. Housecall's Motion to Compel was authored by Marty Schwartz and presented by Nicholas Standiford. Mr. Schwartz had an all day settlement conference in Waukegan on March 7 and other personal matters to attend to, including a morning-long doctor appointment. Nicholas Standiford has had to

absorb a host of additional matters in view of his boss Michael Kujawa's ongoing engagement in a jury trial in Cravatta v. METRA, now in its 3rd week, which circumstance was not anticipated when the filing dates were set and Response received.

3. Due to the foregoing crush of business and the length and nature of Plaintiff's Response, the undersigned counsel contacted Plaintiff's counsel if he had any objection to an extension to submit its Reply by March 13, 2017, as to precede the status hearing date of March 14, 2017.

4. Housecall has received no objection as of the time of this filing and Plaintiff would not be prejudiced by such extension.

WHEREFORE, Housecall Physicians of Illinois, S.C., respectfully requests this Court to grant it an extension for filing of its Reply, and for such other and further relief as is just and proper.

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HOUSECALL PHYSICIANS OF
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/s/ Kevin A. Ameriks
One of Its Attorneys